

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )  
v. ) No. 08 CR 391  
HOLY YANG ) Magistrate Judge Ashman

**AGREED MOTION TO  
DISMISS REMOVAL COMPLAINT WITHOUT PREJUDICE**

The United States of America, by and through its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, hereby respectfully moves, pursuant to Federal Rule of Criminal Procedure 48(a), that this court dismiss without prejudice the removal complaint against defendant in the above-captioned action. The defendant has now appeared in the Eastern District of Michigan pursuant to the arrest warrant issued. On May 20, 2008, government counsel, Lisa Noller, spoke to defendant's counsel, Matthew Madden, who agreed to this motion.

Dated: May 22, 2008

Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney

By: /s/ Lisa M. Noller  
LISA M. NOLLER  
Assistant United States Attorney  
219 South Dearborn Street  
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**Certificate of Service**

The undersigned Assistant United States Attorney hereby certifies that in accordance with Fed. R. Crim. P. 49, Fed. R. Civ. P. 5, LR 5.5 and the General Order on Electric Case Filing (ECF), that the United States' Agreed Motion to Dismiss Removal Complaint Without Prejudice was served on Matthew Madden, pursuant to the district court's ECF system, on May 22, 2008.

s/Lisa M. Noller  
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